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*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

STANLEY E. STILWELL, JR., an individual,  
 Plaintiff,

vs.

CAESARS ENTERTAINMENT CORPORATION,  
 a Foreign Corporation; BARTENDERS' UNION  
 LOCAL 165, a domestic not for profit corporation;  
 DOES I through X, inclusive; ROE  
 CORPORATIONS I through X, inclusive,  
 Defendants.

CASE NO: 2:19-cv-01896-KJD-VCF

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND TIME FOR  
 PLAINTIFF TO RESPOND TO  
 DEFENDANT BARTENDERS' UNION  
 LOCAL 165'S MOTION TO DISMISS  
 AND FOR DEFENDANT TO REPLY**  
 (First Request)

COMES NOW, Plaintiff, STANLEY E. STILWELL, JR. (hereinafter, "Plaintiff"), by and through his attorney of record Trevor J. Hatfield of the law firm of Hatfield & Associates, Ltd., and BARTENDERS' UNION LOCAL 165's (hereinafter "Defendant Local 165"), by and through its attorney of record Sarah Grossman-Swenson, Esq. of the law firm of McCracken, Stemerman & Holsberry, LLP, and do hereby stipulate and agree to an extension of time for Plaintiff to respond to Defendant Local 165's Motion to Dismiss (ECF #14), that was filed on March 10, 2020. Accordingly, Plaintiff shall have up to and including April 7, 2020 to respond to Defendant Local 165's Motion to Dismiss (ECF No. 14).

The reason that the extension is requested is because the parties originally agreed to a continuance as an Early Neutral Evaluation Session ("ENE") was scheduled for March 25, 2020

(ECF No. 9) which has now been rescheduled to May 8, 2020 (ECF No. 15). Nevertheless, the parties hereby request this Stipulation and Order to continue Plaintiff's deadline to file an Opposition to Defendant Local 165's Motion to Dismiss to April 7, 2020.

This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the parties' first request for an extension of the time for Plaintiff to respond to Defendant Local 165's Motion to Dismiss.

Dated this 24<sup>th</sup> day of March 2020.

Dated this 24<sup>th</sup> day of March 2020.

HATFIELD & ASSOCIATES, LTD.

McCRACKEN, STEMERMAN &  
HOLSBERRY LLP

*/s/ Trevor J. Hatfield*

*/s/ Sarah Grossman-Swenson*

By: \_\_\_\_\_  
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*Attorneys for Defendant Bartenders' Union  
Local 165*

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1 Dated this 24<sup>th</sup> day of March, 2020.

2  
3 FENNEMORE CRAIG, P.C.

4 /s/ Shannon S. Pierce

5 By: \_\_\_\_\_  
6 Shannon S. Pierce, Esq. (SBN 12471)  
7 Elizabeth J. Bassett, Esq. (SBN 9013)  
8 300 East Second Street, Suite 1510  
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10 Telephone: (775) 788-2200  
11 Email: [spierce@fclaw.com](mailto:spierce@fclaw.com)  
12 Attorneys for Defendant  
13 Caesars Entertainment Corporation

14  
15 **IT IS SO ORDERED.**

16 

17 UNITED STATES DISTRICT JUDGE

18 DATED: 4/02/2020, 2020.

19  
20 **CERTIFICATE OF SERVICE**

21 I certify that on the 24<sup>th</sup> day of March 2020, I electronically filed the foregoing  
22 **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR PLAINTIFF TO**  
23 **RESPOND TO DEFENDANT BARTENDERS' UNION LOCAL 165'S MOTION TO**  
24 **DISMISS AND FOR DEFENDANT TO REPLY (First Request)** with the Clerk of the Court by  
25 using the ECF system.

26  
27 Dated this 24<sup>th</sup> day of March 2020.

28 By: /s/ Freda P. Brazier  
An employee of Hatfield & Associates, Ltd.